

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

JUDY JIEN, et al.,

Plaintiffs,

vs.

PERDUE FARMS, INC. et al.,

Defendants.

C.A. No. 1:19-cv-02521-SAG

**DECLARATION OF ELIZABETH H. FRENCH**

I, Elizabeth H. French, pursuant to 28 U.S.C. §1746, declare as follows:

1. I am an attorney at Simpson Thacher & Bartlett LLP and serve as counsel for Tyson Foods, Inc. and Keystone Foods, LLC in this action.
2. I have personal knowledge of the matters stated herein, and, if called upon, I could and would competently testify thereto.
3. Attached as Defendants' Exhibit 1 (DX001) is a true and correct copy of Defendant Jennie-O Turkey Store, Inc.'s Answers and Objections to Plaintiffs' First Set of Interrogatories to All Defendant Processors.
4. Attached as Defendants' Exhibit 2 (DX002) is a true and correct copy of a document produced in this action bearing Bates stamp WMS\_000001.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 19, 2021.

/s/ Elizabeth H. French

Elizabeth H. French

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